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October 5, 2021

Via ECF

The Honorable James L. Cott Magistrate Judge for the Southern District of New York 500 Pearl Street New York, NY 10007

Re: Brown v. Flexibility Capital Inc., Case No. 21-cv-06009-ALJ-JLC

Your Honor:

Represent Flexibility Capital Inc. in the above-referenced matter. I am in the process of finalizing defendant Flexibility Capital's letter motion requesting bifurcation of discovery to be filed later today. I respectfully request that I be permitted to exceed the five (5) page maximum length (excluding attachments) contained in your Individual Practice Rule I. A. I anticipate the length of my letter motion to be no more than seven (7) pages in length.

Thank you,

Clifford Olshaker